

USEPA/OECA/OC
State and Tribal Assistance Grant (STAG) 2000-2001
Missouri: Hazardous Waste Enforcement Data Quality Improvement Project
Quarter 1, FY2002
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REPORTING PERIOD: 2001 - October 1, 2001 through December 31, 2001

I. INFORMATION:

State and Department:	Missouri Department of Natural Resources
Title of Project:	Hazardous Waste Enforcement Data Quality Improvement Project Enforcement and Compliance Assurance Grants
Grant Contact Person:	Kathy Flippin, Hazardous Waste Unit Chief
Funds Received by State:	July 1, 2001
EPA Regional Project Officer:	Carol Clopton
Author of Report:	Millie Wieberg, Data Quality Analyst

II. STATUS OF PROJECT MILESTONES (The dates on the schedule in the Narrative Description of Project which assumed a project period of April 1, 2001 through March 31, 2002 have been adjusted below to reflect when funds were received by the state to begin the project. The Project Period on the Grant Agreement is May 15, 2001 through June 30, 2002, but funds were not received until July 1, 2001. Therefore, all anticipated completion dates are moved three months forward from the date of April 1, 2001 that was originally anticipated in the Narrative Description of Project.)

PROJECT MILESTONES	ANTICIPATED COMPLETION DATE	COMPLETION DATE
Complete work on RCRAInfo to July 1, 1990	December 31, 2001	Ongoing
Data review/repair completed for enforcement data in HWP's I&E database to July 1, 1998	December 31, 2001	Ongoing
Data review/repair of inspection data in HWP's I&E database to June 30, 1995	December 31, 2001	Ongoing
Complete ongoing data improvement in HWP's I&E Database and ETS	Ongoing	Ongoing

III. STATUS OF PROJECT COMPLETION

The second quarter of the project has been completed, and work is progressing well. Work is ongoing rather than scheduled because I have found that it is most efficient to correct errors as they are encountered rather than working in five-year increments as originally planned. When we are able to produce reliable queries on the systems, current data correction practices may be modified.

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IV. RESULTS

All Handler and Evaluation Logs (HELs) have been entered into RCRAInfo except for four. Data for two facilities were found in the HWP's I&E database, but not on RCRAInfo. The other two HEL forms with the same site are listed under different names in RCRAInfo and Missouri's generator database. Since Missouri is the implementer of record for the Handler Module in RCRAInfo, this was forwarded to the Budget and Planning Section to be reconciled. These will need to be resolved prior RCRAInfo data entry. We are still waiting for "bug 4629" to be corrected prior to linking the remaining violations with 310 enforcement actions for the Cape Chemical and West Star records.

Additional training for the department's Enforcement Tracking System (ETS) was received on October 4, 2001. Cheryl Heet, Enforcement Unit Secretary, and I attempted ETS entry but observed discrepancies between the field names on the ETS Violations History Summary that case managers are using and field names in the ETS database. The database will not accept certain data. The list used by the case managers and that given by the trainer was different. ETS would not allow two violations with the same heading. For example, violations 45201 and 45299 are both listed under heading of "containers" (from the list the case managers are using). ETS would only allow one entry regarding containers-#45200 (from the new list). The old list has been discarded. We also observed problems when attempting to enter data into the fields for penalty-paid, penalty assessed and penalty suspended. We also had to request SIC codes to fill in data gaps.

During a conference with Kathy Flippin, HWP Enforcement Unit Chief, it was decided to contact Duan Bills, Computer Programmer, for his assistance in preparing queries from HWP's I&E database. The queries could then be used to check for data gaps in RCRAInfo, and to do cross checks for data accuracy between RCRAInfo and the I&E database. We met with Mr. Bills on October 10, 2001 and listed query priorities. Due to other commitments, Mr. Bills was unable to prepare the queries in the time requested.

Remaining checks on HEL forms in binders were completed to assure that forms were in alphabetical order and correctly filed. Records A through M were completed in the first quarter of the project and records N through Z were completed on November 6, 2001. The Hazardous Waste Enforcement File List was used as a guide for alphabetizing the HEL forms.

Using an IDEA Web Query from RCRAInfo, we identified 255 facilities with violations continuing for more than 5 years. A search was made in RCRAInfo, HWP's I&E

database, and on filed HEL forms to update and/or correct information. I made lists for each of the six regional offices of facilities in their regions that had open compliance dates. The lists included the Handler name, EPA ID number and evaluation date. Mrs. Flippin forwarded the lists to Regional Offices requesting that they provide return to compliance dates or note if compliance should remain open. Some of the lists were returned and records were updated in RCRAInfo, Fees and Taxes, and on the HEL forms.

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From the 255 facilities, there were approximately 579 evaluations with approximately 1,506 violations. Data for approximately 779 violations has been updated. All lists have not yet been returned from Regional Offices.

I performed an IDEA Web Query from RCRAInfo requesting formal enforcement actions that included penalties within the past 5 years, and 49 records returned. A RCRA SNC Tracker search showed 28 facilities. Approximately 6-8 were EPA records. On December 5 and 6, 2001, Mr. Albert Vargenko, Enforcement Planner, assisted in running queries from HWP's I&E database, listing facilities that were referred to the Hazardous Waste Program's Enforcement Section. Two queries showed 88 enforcement cases that needed to be reviewed and cross checked with RCRAInfo to determine if key enforcement dates were entered and accurate. Information for each facility had to be compared in HWP's I&E database, RCRAInfo, and on the HEL forms. The queries from RCRAInfo and HWP's I&E database did not provide enough specific information, causing some confusion. Some problems occurred during the actual comparison of data entry information due to the following reasons:

1. The Return to Compliance date in HWP's I&E database often didn't correspond with the Return to Compliance date in the other programs.
2. Enforcement action dates were often missing (e.g., Referral to Attorney General's Office or Settlement Agreements).
3. Evaluations data in RCRAInfo did not always appear in HWP's I&E database, and vice versa.
4. In the case of evaluations found in HWP's I&E database, but not in RCRAInfo, HEL forms could not be located because they were apparently never prepared and submitted by inspectors and case managers.
5. HEL forms were difficult to locate when the facility changed names and the HELs were filed under former names (e.g., Millennium Environmental, KC 1986 Limited Partnership).
6. Penalty settlement amounts were not entered.
7. Penalty payment dates and amounts were not entered.
8. Enforcement actions were not linked to violations in RCRAInfo.

Mrs. Flippin provided a list of facilities without compliance dates from 1987-1995 (approximately 700), a list of enforcement actions from FFY 96 and FFY 97, and a copy of information for FY 2000 inspections with no final HEL for use in cross-checking data.

The list of facilities "FY 2000 inspections where no final HEL has been received," were researched and data entry resolved. The facilities without compliance dates (87-95) was

checked against the list sent to Regional Offices for resolution. Some of these have been resolved. We will attempt to resolve the other facilities. The lists of enforcement actions from FFY 96 and 97 will be checked with previous list completed. We will attempt to resolve data regarding all of the other facilities on this list. The list of facilities without compliance dates and the enforcement actions from FFY 96 and 97 do not have EPA or Missouri ID numbers and these will be obtained to allow for more efficient checking.

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Additional concerns that have been identified for potential resolution are:

1. Resource Recovery evaluations are not entered in RCRAInfo as it is not listed in the “Type of Evaluation” drop-down box. Since these are normally compliance evaluation inspections, they will be entered as CEIs, and a notation “RR inspection” will be entered in the comment field in RCRAInfo.
2. A list of facility EPA or Missouri ID numbers with a name history is needed. We will investigate ways to obtain this information.
3. There appears to be confusion about the date to use for return to compliance. This should be the date that we receive the response from the handler that demonstrates compliance. Historically these dates have varied as some have used the date when the inspector or case manager reviewed the documentation, some have used the date of the letter indicating compliance rather than the date received, and some dates are just incomprehensible.
4. I recommend that when inspectors or case managers send a letter confirming compliance, that they include the specific date in the letter that the compliance was achieved (i.e., in most cases the date the final piece of documentation was received that confirms compliance). This will help to assure that accurate dates are entered on HELs.
5. Sampling evaluations and non-financial record reviews (NRR) evaluations cannot be entered into HWP’s I&E database because these inspection types are not listed in the “Inspection Type” drop-down box. Without these, the data in each system will not match in regard to inspection numbers.
6. I am unable to enter old evaluations (e.g., 1995-1996) into HWP’s I&E database because I receive a message that “fiscal year has been removed from the system.” I have asked that this be corrected.